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| ENJ. A.                        |                | Г        | _  |
| ERMAN, H.S.                    |                | Г        |    |
| RANCH, D.B.                    |                | Г        | _  |
| ARNIVAL, G.J.                  | _              | ٢        | _  |
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| EALY, T.J.                     | -              | ╀        |    |
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| HLBIG, J.G.                    | _              | ╀        |    |
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| KIRBY, W.A.                    | _              | 4-       |    |
| KUESTER, A.W.                  |                | ╀        | _  |
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| SWANSON, E.R.                  | 1-             | +        | _  |
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## EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

December 7, 1993

93-RF-14788

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Jen Pepe Environmental Restoration Division DOE, RFO

PROJECT SCOPE CLARIFICATION FOR THE INDUSTRIAL AREA INTERIM MEASURE/INTERIM REMEDIAL ACTION PLAN - MSB-049-93

As you know the scope of this project has been more clearly defined due to the numerous interactions between the Department of Energy (DOE), the regulatory agencies, and EG&G Rocky Flats, Inc. While the overall project scope remains unchanged, there have been several clarifications which warrant a subcontract modification.

This contract modification can be accomplished without impact to the current project funding level, and should only require a work package revision. The following details represent the scope clarifications that will be submitted for contract modification:

The original Statement of Work (SOW) did not adequately represent the time required for the subcontractor to fulfill the EG&G Rocky Flats training requirements. The modification will provide additional hours to fulfill these requirements. Training requirements are expected to include General Employee Training - 8 hours, Unclassified Nuclear Information Training - 1 hour, Radiological Worker Training - 24 hours, RCRA [Resource Conservation and Recovery Act] Computer-Based Training - 2 hours, and Quality Assurance Overview Training - 1 hour. Additionally, 16 hours of unspecified training is being planned to allow for training additions which are as yet to be identified. EG&G Rocky Flats shall provide the necessary training, it is the subcontractor's responsibility to ensure that all of its staff are in attendance.

The original SOW required attendance at bi-weekly performance meetings. Due to the ambitious project schedule, the need to maintain open communication, and the success of these meetings, the modification allows for an additional five meetings in anticipation of the need for issue resolution as the project progresses.

ADMIN RECCRD

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The Decontamination and Decommissioning (D&D) process is not within the scope of this project, but the Industrial Area (IA) Interim Measures/Interim Remedial Action (IM/IRA) document should include as part of its recommended actions additional monitoring which would serve as verification monitoring to ensure that D&D environmental protective systems are performing adequately. These monitoring recommendations shall be based on the pathway analysis of Task 4 of the SOW, and the contaminants of potential concern identified in Task 3 of the SOW. Additional recommendations for pathway protection during non-routine events shall also be included as part of the IM/IRA. Monitoring to verify the effectiveness of pathway protection actions shall be considered for specific sub-basins of areas being D&D'd and may potentially be closer to internal source areas than the normal monitoring program.

In providing recommendations for monitoring system upgrades the IM/IRA should provide an evaluation of the best available technology, and most appropriate technology. This evaluation may be presented in the form of an alternatives analysis which addresses costs, technical feasibility, implementability, performance objectives, and any other appropriate consideration. In this analysis, the applicability and feasibility of real time monitoring techniques should be also be considered. Library key word searches shall be conducted as a starting point for technology assessment and availability.

It is not the intent of this project to evaluate Rocky Flats Plant's emergency response capabilities, however, to properly represent the overall "safety net" of protection provided for the industrial area, an overview of the Plant's emergency preparedness capabilities should be presented as it relates to spills or releases within the IA. It should be presented in a manner which shows the process and comprehensiveness of the program without presenting a critique or review. The IM/IRA document shall provide the link between D&D pathway protection, verification monitoring, and emergency response. The document shall illustrate how acute releases (spills), during D&D or other non-routine activities, detected by verification monitoring can be incorporated into the Plant's Emergency Response program. The document shall also define response action levels for chronic releases detected by verification monitoring. These levels shall be determined by evaluating background information relative to the pathways effected by the non-routine activities. Existing data shall be used for this determination. If the appropriate data does not exist, recommendations shall be made for the development of an appropriate data set.

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In addition to the above scope clarifications, I have asked the subcontractor to plan for a visit to the Weldon Spring site in St. Charles, Missouri. The planning of such a trip does not commit us, but will provide us an opportunity to visit a site that is going through D&D and evaluate any lessons learned regarding pathway protection, and environmental monitoring during this process.

Because of our aggressive project schedule, it is imperative that this contract modification be initiated immediately. Your timely concurrence on this matter is appreciated. Please contact me at extension 8519 if you have any questions or require additional information.

Mark S. Buddy

Project Manager

ERM/Remediation Project Management

EG&G Rocky Flats, Inc.

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Orig. and 1 cc - J. Pepe